

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DR. JASMINE YOUNGE,

Plaintiff,

v.

FULTON JUDICIAL CIRCUIT
DISTRICT ATTORNEY'S
OFFICE, GEORGIA

Defendant.

Civil Action No.

1:20-cv-00684-WMR-CMS

JURY TRIAL DEMANDED

**MOTION TO EXCEED PAGE LIMITATIONS ON
RESPONSE TO STATEMENT OF MATERIAL FACTS /
STATEMENT OF ADDITIONAL FACTS AND BRIEF**

Plaintiff, through undersigned counsel, files this motion respectfully requesting that the Court permit Plaintiff's Response to Defendant's Statement of Material Facts ("RSMF") / Statement of Additional Facts ("SAF") to exceed the page limitation set forth in Hon. Salina's Order. [Doc. 58]. In support thereof, Plaintiff states:

1. Specifically, in an Order dated April 27, 2021, the Court directed the Summary Judgment Respondent (here, Plaintiff) to file her RSMF and SAF as one document and limited that document to five pages. [Doc. 58].

2. Plaintiff's counsel has endeavored to keep the combined RSMF/SAF document to five (5) pages or less but has been unable to address the material facts of this case and respond to Defendant's material facts in less than eleven (11) pages.
3. There are a large number of facts and issues in dispute in this case, and each of the responses and facts identified are material and necessary to provide the Court with the information it needs to determine this important motion.
4. Plaintiff, therefore, respectfully requests leave to file an additional six (6) pages in the combined RSMF/SAF document.
5. Plaintiff's counsel has conferred with Defendant's counsel regarding the requested page extension. Defendant opposes the requested extension.
6. Due to the important nature of the motion at issue and the necessity of providing the Court with the necessary material facts, Plaintiff maintains that good cause has been shown and that these extensions are both necessary and appropriate.

WHEREFORE, for the foregoing reasons and good cause having been shown, Plaintiff respectfully requests that this Court grant Plaintiff leave to file eleven (11) pages for her combined RSMF/SAF document. A proposed order granting this motion is included herewith, as is the proposed RSMF/SAF document.

Respectfully submitted the 13th day of June, 2022.

BARRETT & FARAHANY

s/ Matthew C. Billips

Matthew C. Billips

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed *MOTION TO EXCEED PAGE LIMITATIONS ON RESPONSE TO STATEMENT OF MATERIAL FACTS / STATEMENT OF ADDITIONAL FACTS AND BRIEF* with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

Respectfully submitted the 13th day of June, 2022.

BARRETT & FARAHAANY

s/ Matthew C. Billips
Matthew C. Billips
Georgia Bar No. 057110